QAA

The UK Quality Code Review 2023-24: Summary of Feedback to Date

Context to the review of the Quality Code 2022-23

The current (2018) version of the UK Quality Code for Higher Education (the Quality Code) was the third iteration. However, since 2018, there have been (or are about to be) significant changes to the regulatory structures of higher education across the UK. This presents an opportunity to review and consider the direction, structure, content and presentation of a future Quality Code to ensure it remains valued and useful to the sector across the UK, as well as supporting the international reputation of UK higher education.

Gathering feedback

Since October 2022, QAA has been gathering feedback to inform the structure, direction, structure, content and presentation that a reviewed Quality Code could take (see table below). This document offers a summary of the key areas of feedback to date.

Sector bodies	Sector groups and committees	Roundtable sessions (Jan x 2, Feb & March 2023)	QAA groups and networks
Association of Colleges	ARC QPG	England: 95 individual institutions	PVC Strategy Summit
GuildHE (Quality Managers)	QSN (Exec)	Scotland: 9 individual institutions	College, HE Network
HEFCW	QASHE	Wales: 3 individual institutions	Specialist and Independent Network
SFC	Russell Group Quality Practitioners	Northern Ireland: 11 individual institutions	Strategic Student Advisory Committee
QAA staff	Independent HE *(date TBC)*	Colleges: 15 individual institutions	Student Network
	Universities Wales Learning and Teaching Network	Sector bodies/ agencies: 6	PSRB Forum
			International Insights Policy and Practice Network
			Wales Quality Network

			The Quality Forum (Scotland)

How the Code is used

Feedback tells us that providers are using the Advice and Guidance on a day-to-day basis but map to the Expectations and Core and Common practices of the Code for reporting and at a strategic/managerial level. The Code offers new practitioners and institutions a useful overview as to what Quality and Standards looks like across the UK.

'The real value of the QC is now much more developmental rather than regulatory; it has become a very important resource for helping each provider to design their own quality systems.'

'Using the core practices and expectations - using 'code' as reactive document and strategic. Use advice and guidance as practitioners - works up to the core practice. Practice and process mapped against expectations.'

The Quality Code and enhancement

There is support for a revised Quality Code to have an enhancement ethos, although there were differing views as to where enhancement should sit within it. It was evident from feedback that a clear definition and contextualisation for all nations was important, but also recognition this was not easy to achieve.

'Enhancement should be central to the code and woven into the core practices.'

'Unanimous support for enhancement as a key theme but needs to be codified/contextualized by each of the 4 nations and carefully defined.'

'There's a great opportunity to think of the Code in terms of enhancement/practice beyond the baseline, as the B conditions become more embedded in measuring 'good enough.'

'More for the advice and guidance. Enhancement is overarching rather than a specific element. It would also be useful to look at measuring the impact of enhancement.'

Using the Quality Code across the nations

Ensuring the voice of the UK nations is included in the review of the Quality Code was important as it is used for review purposes in Scotland, Wales and Northern Ireland. There was also a need to ensure that the Quality Code applies across the UK regardless of the regulatory systems in place in each nation.

'We evidence our current mapping to the QC to fulfil the phase 1 2022-24 Scottish quality arrangements - Institutional Liaison Meeting and Quality Enhancement and Standards Review.'

'Reluctant to see a Code diverge between nations. Would like something common to all nations even though it may be used differently. Fragmenting the Code is problematic.'

'In Wales, the Quality Code is required, and enhancement can be difficult from a compliance perspective - need to show how it would work. For this reason, it would be better if the

enhancement focus was covered in the advice and guidance, rather than in the key elements of the Quality Code.'

Overarching structure

Feedback noted that a revised Quality Code in its structure will need greater flexibility as it accommodates different operating models across the UK. There was also recognition that the separate elements of the Code made a complete 'recipe' for quality and standards, and, as such, providers could choose at which level they engage to achieve it. There was feedback from students' unions that a revised Quality Code should be simple in its approach, providing 'common language' for students and academics about what quality looks like.

'Strength is to have more flex than previous version - will be used differently in different HEIs and sectors.'

'From an SU perspective simplicity is really important, having a common language around what the Quality Code looks like which is accessible to students and academics would be helpful.'

'Newer format is helpful and easier to map to as it offers more flexibility of interpretation. Some good practice welcomed but avoid going back to previous long document.'

The Quality Code as a succinct and separate document

There was a consensus that the brevity of the current Quality Code, with Expectations and practices supported by Advice and Guidance themes, was to be retained in some form. Feedback intimated that it made it more accessible and useful to new members of staff and students, and that it offered a welcome change from the previous longer version. However, criticism was levied at the fact it made the Code harder to navigate across all its elements.

'Makes it more accessible and has guidance to support it.'

'Succinctness of code a useful tool - needs a framing to navigate it - overall strategy of main code.'

Expectations

There was lukewarm support to keep the Expectations, which some providers use for reporting and high-level mapping. However, others noted that they do not use them as they were too vague to be of use.

'We also find the expectations to be vague and difficult to measure/implement. For example, no institution would say that they are not designing high quality academic experiences.'

'I like the idea of expectations across the sector - what one institution can expect from another. Its more sectoral.'

Core and Common practices

There was very strong support to merge the Core and Common practices. There was some commentary around using the practices in place of the Expectations.

'Do not see relevance of Core practices any more now we have the OfS which sets the minimum standard. Want something that supports Quality Enhancement and raises bar higher.'

'Why do we need the Expectations - when Core and Common practices do the job? Could they be headings, not really measuring against them, more the Core practices.'

'The Common Practices don't give an enhancement framework - re-focusing on enhancement through QER.'

What is missing from the practices?

Those who provided feedback on the Core practices also highlighted what is missing from them. This included:

- highlighting the dual responsibilities of partnerships
- working in partnership with students
- transitions
- academic integrity.

Advice and Guidance

It was clear from feedback that practitioners use the Advice and Guidance on a frequent basis compared to the use of the Core and Common practices. In addition, we received strong support for the reflective questions used in the current version. There was a call for QAA to integrate other work undertaken in key areas to support the Advice and Guidance, such as that on academic integrity. In addition, reference was made to keeping postgraduate research explicit in the Advice and Guidance.

'We find the A&G very helpful - particularly the reflective questions when reviewing policy/procedures etc.'

'Younger institutions make more use of Advice and Guidance than Code - that is where the 'interesting bits' are. The Code itself can seem a bit 'vanilla' at times.'

'The reflective questions format is brilliant for supporting different contexts.'

Navigation

Commentary noted that navigation between the elements of the Quality Code needs to be improved for mapping purposes and that the relationship between the sector-agreed principles in the Advice and Guidance and the Core and Common practices is unclear. It was also mentioned that there are simply too many clicks to navigate the different elements of the Quality Code on the website.

'It would be good if the information was more easily accessible - from one document, rather than needing to navigate the website and then download the advice and guidance separately. Some form of links from the QC to the relevant advice and guidance and supporting documentation (eg toolkits).'

'I am not sure who the code is for' with 'unclear relationships between principles and practices. This needs to be tightened up.'

'Current version of the Code makes mapping harder than previous version - can there be a clearer hierarchy or structure of elements?'

The tertiary question

Participants in the feedback gathering exercise were cautious about including tertiary education formally within the Quality Code and generally indicated more research was required. There were also different definitions of tertiary education and divergent regulatory structures in use which would be difficult to encompass in a Quality Code for higher education. However, it was noted that there were aspects to an increased focus on tertiary education in Scotland and Wales that could be beneficial, including continuing professional development and private training, and Level 3 Foundation Levels often incorporated into four-year degrees.

'When I hear 'tertiary', think of FE colleges. Who is the audience and how to produce info for all audiences? – expectations and structures are so different in colleges.'

'QC has always been very UGT focused (Levels 4,5 and 6), not capturing either Foundation (3) or PGT (6). No reason to change this and sensible to confine ourselves to HE. Foundation-level guidance could be useful, though.'

Wider focus of outcomes along with process

This point came up throughout the course of the feedback gathering exercise and centred on the idea that the Quality Code was sometimes described as overly process focused with a lack of emphasis on outcomes which are increasingly prevalent in regulatory structures across the UK. However, it is worth noting that the commentary on outcomes was not universally agreed.

'Some emphasis must be placed on how the practices are measured to demonstrate that they deliver the outcomes for the students. Processes, though important, do not necessarily translate into outcomes.'

'Current code to define what practices are - we can then redefine that in our own context. Cannot control student outcomes but can improve practices to enable them to achieve success.'

'A really important question is: What does a good quality experience look like, regardless of the outcome at the end?'

'The Code has the ability to connect process to outcome, then you can guarantee that it is reviewing the student journey, identifying barriers.'

Links to good practice/case studies

A popular suggestion was for case studies to be included into the Advice and Guidance which would enable institutions to put the information into context. However, there are also calls to keep the Quality Code to a practical length and to exercise caution when using case studies as they date quickly and are very specific to individual providers.

'It can sometimes be difficult to put QAA information into context - for example, into the context of an FE College. So, examples of practice that illustrate this would be useful.'

'Case studies go out of date very quickly - if we have these, they need to be separate with applicable date and contact details. Agree - sound attractive initially but it is a lot of extra volume and can be very specific to the HEI.'

Mapping to frameworks

During the feedback exercise, we asked if providers would find it useful to map the Quality Code to other national and international frameworks. Overall, feedback to this suggestion was largely positive; however, there was a strong message that any mapping to national frameworks should not be explicit within the Code itself, nor in the Advice and Guidance, due to the frequency of change. However, there was strong support to map the Quality Code to the European Standards and Guidelines (ESG). Many English providers supported some form of mapping of the Code to the Office for Students (OfS) B conditions, but as a reference document rather than a formal part of the Quality Code. Caution was expressed about not making the Code too complex.

'*Danger of the Code trying to satisfy too many parallel frameworks.*'

'*UK wide code clearly aligned to ESG is important for TNE and reputation of UK providers.*'

'*Mapping to ESG, especially if you have partners in Europe and given that the UK is still part of the European Higher Education Area, might be helpful. The ESG also has headlines at the top level with the more detailed information underneath it, so it is structured in a similar way.*'

'*The Quality Code should not pull away from the conditions of registration, those could be implicit in the QC but not necessarily an explicit part of it - this to avoid OfS continually saying the Code got their conditions wrong etc. It is a moveable feast trying to align with the OfS but sitting alongside would be helpful.*'

Student engagement

There have been calls to embed student engagement more explicitly throughout the Advice and Guidance, and to strengthen the wording in the practices. An interesting point has been made around the use of student engagement in specific Quality Practices and that this should provide the focus for the Advice and Guidance theme.

'*Looking at the assurance of student engagement and enhancement - there is a large focus on student engagement etc in the advice and guidance, but it would be good to look at the value of student engagement for quality purposes.*'

'*More detail would be useful, for example, on the types of engagement as there is sometimes a difference in understanding.*'

'*Student engagement could be weaved through but needs to be explicit.*'

Non-traditional delivery

There was a notable call for non-traditional forms of delivery to be included more explicitly with guidance around the challenges they present for quality assurance.

'*Apprenticeships could feature more in the Code along with micro-credentials and other flexible learning - these present particular QA challenges.*'